

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

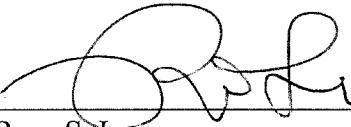
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THE NEW YORK TIMES COMPANY, : Case No. 1:23-cv-11195-SHS
Plaintiff, :
: -against-
MICROSOFT CORPORATION, OPENAI, :
INC., OPENAI LP, OPENAI GP, LLC, :
OPENAI, LLC, OPENAI OPCO LLC, :
OPENAI GLOBAL LLC, OAI :
CORPORATION, LLC, OPENAI :
HOLDINGS, LLC, :
Defendants. :
----- X

NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

PLEASE TAKE NOTICE that upon the annexed declaration of Rose S. Lee in support of this motion and the Certificate of Good Standing annexed thereto, Defendants, OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, and OPENAI HOLDINGS, LLC will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York for an Order admitting Rose S. Lee of the firm of Morrison & Foerster LLP, and a member in good standing of the Bar of the State of California, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for Defendant.

Dated: Palo Alto, California
February 8, 2024

MORRISON & FOERSTER LLP

By: 

Rose S. Lee
RoseLee@mofo.com
707 Wilshire Boulevard, Suite 6000
Los Angeles, CA 90017-3543
Telephone: (213) 892-5200
Facsimile: (213) 892-5454

Attorneys for Defendants
OPENAI, INC., OPENAI LP, OPENAI
GP, LLC, OPENAI, LLC, OPENAI
OPCO LLC, OPENAI GLOBAL LLC,
OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC